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*Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley  
ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 DEUTSCHE BANK NATIONAL TRUST  
13 COMPANY, AS TRUSTEE FOR MORGAN  
14 STANLEY ABS CAPITAL I INC. TRUST  
15 2007-NC1 MORTGAGE PASS-THROUGH  
16 CERTIFICATES, SERIES 2007-NC1,

17 Plaintiff,

18 vs.

19 FIDELITY NATIONAL TITLE GROUP,  
20 INC.; FIDELITY NATIONAL TITLE  
21 INSURANCE COMPANY; FIDELITY  
22 NATIONAL TITLE AGENCY OF NEVADA,  
23 INC.; DOE INDIVIDUALS I through X; and  
24 ROE CORPORATIONS XI through XX,  
25 inclusive,

26 Defendants.

Case No.: 2:20-cv-02146-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos.  
27-29]**

**[Second Request]**

27 Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS  
28 Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1  
("Deutsche Bank Trustee"), Specially-Appearing Defendant Fidelity National Title Group, Inc.,  
and Defendants Fidelity National Title Insurance Company, and Fidelity National Title Agency  
of Nevada, Inc. ("Defendants", collectively, the "Parties"), by and through their counsel of  
record, hereby stipulate and agree as follows:

- 1       1. On November 20, 2020, Deutsche Bank Trustee filed its Complaint in Eighth Judicial
- 2       District Court, Case No. A-20-825215-C [ECF No. 1-1].
- 3       2. On November 22, 2020, Fidelity National Title Insurance Company filed its Petition for
- 4       Removal to this Court [ECF No. 1].
- 5       3. On February 8, 2021, Fidelity National Title Group, Inc., Fidelity National Title
- 6       Insurance Company, and Fidelity National Title Agency of Nevada, Inc. filed Motions to
- 7       Dismiss [ECF No. 27-29].
- 8       4. Deutsche Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is
- 9       currently March 24, 2021.
- 10      5. Deutsche Bank Trustee's counsel is requesting an extension until April 27, 2021, to file
- 11      its response to the pending Motions to Dismiss.
- 12      6. This extension is requested to allow Deutsche Bank additional time finalize and file its
- 13      response to the pending Motions to Dismiss as lead handling counsel for Deutsche Bank
- 14      Trustee continues to recover from an unexpected medical emergency.
- 15      7. Counsel for Defendants does not oppose the requested extension;

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8. This is the second request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 23<sup>rd</sup> day of March, 2021.

DATED this 23<sup>rd</sup> day of March, 2021.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Robbins

/s/ Kevin Sinclair

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Morgan Stanley ABS Capital I Inc. Trust  
2007-NC1 Mortgage Pass-Through  
Certificates, Series 2007-NC1*

*Attorneys for Defendants, Fidelity National  
Title Group, Inc., Fidelity National Title  
Insurance Company, and Fidelity National  
Title Agency of Nevada, Inc.*

**IT IS SO ORDERED.**

Dated this 24th day of March, 2021.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**